



Cooper Strickland <cooper.strickland@gmail.com>

Trial preparations

Kolsky, Joshua (CIV) <Joshua.kolsky@usdoj.gov>

Thu, Dec 7, 2023 at 8:26 PM

To: Cooper Strickland <cooper.strickland@gmail.com>, "Wolfson Young, Danielle (CIV)" <Danielle.Young2@usdoj.gov>

Cc: "Canevari, Dorothy M. (CIV)" <Dorothy.M.Canevari@usdoj.gov>, "McMahon, Madeline M (CIV)" <Madeline.M.McMahon@usdoj.gov>

Mr. Strickland,

Thank you for your emails on this issue. We believe that Plaintiff's exhibits 52, 66, and 82D contain information about EDR matters or personnel actions that should not be made public without the consent of the individuals to whom the information pertains. We propose that the parties jointly request the Court that, if these exhibits are admitted into evidence, they be filed under seal, and that the courtroom be sealed for any testimony or discussion of those exhibits that would reveal the confidential information therein. Please let us know if Plaintiff is amenable to making such a request.

Furthermore, as you likely have seen, Defendants' exhibits 141 and 152 were designated as confidential by Plaintiff. In addition, Defendants provide notice pursuant to Section E(7) of the Court's Protective Order that they may use at the trial portions of Plaintiff's deposition transcripts in this matter that were marked as confidential. We are available to meet and confer if that would be helpful.

Regards,

Josh

[Quoted text hidden]